

LINCOLN SQUARE LEGAL SERVICES, INC.

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March 22, 2018

VIA ECF

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: *Lincoln Square Legal Services, Inc. v. Internal Revenue Service,*
Case No. 18 Civ. 2217 (AT) (OTW)**

Dear Judge Torres:

This firm is the Plaintiff in the above-entitled action. Plaintiff submits this letter to request an extension to file a joint letter and adjournment of the initial pre-trial conference.

Pursuant to Your Honor's March 15, 2018 Order, a joint letter by the parties is currently due on March 30, 2018, and an initial pre-trial conference is scheduled for April 4, 2018. On March 16, 2018, Plaintiff served a copy of this Court's Order at the same time Plaintiff served Defendant Internal Revenue Service with the Summons and Complaint in this action. As of the submission of this letter, Plaintiff has not been contacted by a representative for Defendant.

To allow the parties sufficient time to meet and confer about possible settlement and work on the joint letter once an Assistant United States Attorney is assigned and appears in this case, Plaintiff respectfully requests that the deadline to file the joint letter be extended to April 20, 2018, and the initial pre-trial conference be adjourned to April 25, 2018. There have been no previous requests for extension or adjournment of the ordered letter and conference. Plaintiff believes that the requested extension and adjournment will not prejudice any party or cause an unreasonable delay in this action.

We appreciate Your Honor's consideration of this request.

Respectfully,

/s/ Ron Lazebnik

Ron Lazebnik
Supervising Attorney

CC (by Hand): Internal Revenue Service
c/o United States Attorney
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